

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

JUDGE PALLMEYER

ASMAR DANKHA,

Plaintiff,

vs.

SECURE SECURITY, INC.

Defendant.

MAGISTRATE JUDGE MASON
PLAINTIFF DEMANDS TRIAL BY JURY

Case No.

02C 7371

FILED-EDS

OCT 15 11 30 AM

CLERK
U.S. DISTRICT COURT

COMPLAINT

NOW COMES Plaintiff, ASMAR DANKHA, by and through her attorneys, BAE & BAE, P.C., and for her Complaint against SECURE SECURITY, INC. states as follows:

DOCKETED

OCT 16 2002

COUNT I – SEXUAL HARASSMENT

1. Plaintiff, ASMAR DANKHA (hereinafter “Plaintiff” or “Dankha”), is a female individual residing in Cook County, Illinois.

2. Defendant, SECURE SECURITY, INC. (hereinafter “Defendant” or “Secure”), is a corporation incorporated under the laws of the State of Illinois having its principal place of business in Cook County, Illinois. Secure is a private company providing security services to individuals and businesses in and around Chicago area.

3. JOHN M. SCATCHELL (hereinafter “Scatchell”), is a male individual and, on information and belief, residing in Cook County, Illinois. At all times relevant to the complaint herein, on information and belief, defendant Scatchell was the sole shareholder holding all corporate offices of defendant Secure (i.e., president, secretary, etc.). Additionally, at all times relevant to the complaint herein, defendant Scatchell was the “Chief of Security” and the immediate supervisor of Dankha, whom she reported to on a daily basis.

1-1

4. This action is brought for violations of Title VII of the Civil Rights Act of 1964, as amended, 42 U.S.C. § 2000(e). Jurisdiction of this Court is founded upon 28 U.S.C. § 1331.

5. Venue is proper in this Court pursuant to 28 U.S.C. § 1391 as, on information and belief, all parties to this action are residents of Cook County, Illinois.

6. On or about May 23, 2001, Plaintiff filed a complaint with the Equal Employment Opportunity Commission ("EEOC") under charge number 210A13374 against Defendant for sexual harassment. (A copy of charge of discrimination is attached hereto and incorporated herein as Exhibit A.)

7. Subsequently, on or about August 23, 2001, Plaintiff filed another complaint with the EEOC under charge number 210A14894 against Defendant for retaliation. (A copy of charge of discrimination is attached hereto and incorporated herein as Exhibit B.)

8. On or about April 26, 2002, the EEOC issued a written determination that the evidence obtained in the investigation establishes reasonable cause to believe that Defendant retaliated against Dankha, in that she was reassigned and constructively discharged after filing a charge of discrimination against Defendant. (A copy of the written determination is attached hereto and incorporated herein as Exhibit C.)

9. The EEOC's efforts to enter into a voluntary conciliation agreement with Defendant were unsuccessful.

10. On or about July 16, 2002, the EEOC sent a right to sue letter to Dankha. (A copy of notice of right to sue letter is attached hereto and incorporated herein as Exhibit D.)

11. Plaintiff began working for Defendant sometime in October of 2000 as a security guard.

12. Beginning sometime in February of 2001 to sometime in May of 2001, Scatchell repeatedly requested Dankha for sexual favors and made unwelcome sexual advances.

13. In response, Dankha refused Scatchell's requests for sexual favors and unwelcome sexual advances and further conveyed to him that his actions were inappropriate and must be stopped.

14. The aforesaid created and subjected Dankha to a sexually hostile work environment.

15. In addition, Dankha was subjected to other unreasonable work conditions as a result of her refusal to submit to Scatchell's requests for sexual favors and sexual advances.

16. By virtue of the foregoing, Defendant has caused Dankha to be subjected to a sexually hostile work environment in violation of Title VII of the Civil Rights Act of 1964, as amended.

17. As a result of the aforesaid violation, Dankha was constructively discharged and, moreover, as a direct and proximate result, has suffered loss of pay incurring past, present and future, humiliation, emotional pain and suffering, inconvenience, mental anguish, degradation, loss of enjoyment of life, and other damages of both pecuniary and non-pecuniary nature.

18. Defendant intentionally discriminated against Dankha in violation of Title VII of the Civil Rights Act of 1964, as amended, and engaged in such conduct that was wanton and malicious warranting the imposition of punitive damages.

WHEREFORE, Plaintiff Asmar Dankha prays this Court to enter a judgment on Count I in her favor and against Defendant Secure Security, Inc. and further award her the following relief:

A. Declare Defendant's conduct to be in violation of Plaintiff's rights;

- B. Enjoin Defendant from engaging in such conduct;
- C. Pay Plaintiff for any loss of wages and/or benefits she has suffered, including but not limited to, back and front pay;
- D. Award Plaintiff compensatory and punitive damages;
- E. Award Plaintiff recovery of attorneys' fees, expert witness and other costs associated with this matter;
- F. Award Plaintiff reinstatement to a position with Defendant Secure Security, Inc. equal to one she would have held but for Defendant's wrongful conduct or award her an appropriate award of front pay equal to the value of her expected net earnings and value of fringe benefits she would have obtained until her retirement;
- G. Award Plaintiff pre- and post-judgment interest; and
- H. Grant such other relief as it may deem just and proper.

PLAINTIFF DEMANDS TRIAL BY JURY.

COUNT II – RETALIATION (TITLE VII)

19. Plaintiff hereby incorporates paragraphs 1 through 18 as paragraph 19 of Count II as though if fully set forth and alleged herein.

20. After Scatchell learned of Plaintiff filing a charge of discrimination (sexual harassment) against him, in retaliation Plaintiff was reassigned to another job assignment, which was less desirable, farther away from Plaintiff's home and subjected to a new work schedule that was impracticable to Plaintiff.

21. As a result of Defendant's retaliatory actions, Plaintiff was constructively discharged and had no alternative but to submit her resignation on or about June 8, 2001.

22. Defendant constructively terminated Plaintiff and effectively forced her to resign because she filed a charge of discrimination (sexual harassment) before the EEOC against Defendant, in violation of Title VII of the Civil Rights Act, as amended.

WHEREFORE, Plaintiff Asmar Dankha prays this Court to enter a judgment on Count II in her favor and against Defendant Secure Security, Inc. and further award her the following relief:

- A. Declare Defendant's conduct to be in violation of Plaintiff's rights;
- B. Enjoin Defendant from engaging in such conduct;
- C. Pay Plaintiff for any loss of wages and/or benefits she has suffered, including but not limited to, back and front pay;
- D. Award Plaintiff compensatory and punitive damages;
- E. Award Plaintiff recovery of attorneys' fees, expert witness and other costs associated with this matter;
- F. Award Plaintiff reinstatement to a position with Defendant Secure Security, Inc. equal to one she would have held but for Defendant's wrongful conduct or award her an appropriate award of front pay equal to the value of her expected net earnings and value of fringe benefits she would have obtained until her retirement;
- G. Award Plaintiff pre- and post-judgment interest; and
- H. Grant such other relief as it may deem just and proper.

PLAINTIFF DEMANDS TRIAL BY JURY.

Respectfully submitted,

ASMAR DANKHA

By: 
One of Her Attorneys

Jennifer E. Bae
ARDC No. 6239405
Samuel S. Bae
ARDC No. 6257863
BAE & BAE, P.C.
39 South LaSalle Street, Suite 311
Chicago, Illinois 60603
(312) 364-0443

EXHIBIT A

CHARGE OF DISCRIMINATION

CHARGE NUMBER

This form is affected by the Privacy Act of 1974; See Privacy Act Statement before completing this form.

EEOC
FEPA

3375

Illinois Dept. of Human Rights

and EEOC

State or local Agency, if any

NAME (Indicate Mr., Ms., Mrs.)

Ms. Asmar Dankha

HOME TELEPHONE (Include Area Code)

(773) 457-8844

STREET ADDRESS

CITY, STATE AND ZIP CODE

DATE OF BIRTH

5526 North Campbell, Chicago, IL 60625

NAMED IS THE EMPLOYER, LABOR ORGANIZATION, EMPLOYMENT AGENCY APPRENTICESHIP COMMITTEE, STATE OR LOCAL GOVERNMENT AGENCY WHO DISCRIMINATED AGAINST ME (If more than one list below.)

NAME

NUMBER OF EMPLOYEES, MEMBERS

TELEPHONE (Include Area Code)

Secure Security

Cat A (15-100)

(773) 769-1625

STREET ADDRESS

CITY, STATE AND ZIP CODE

COUNTY

5681 North Lincoln Avenue, Chicago, IL 60659

031

NAME

TELEPHONE NUMBER (Include Area Code)

STREET ADDRESS

CITY, STATE AND ZIP CODE

COUNTY

CAUSE OF DISCRIMINATION BASED ON (Check appropriate box(es))

☐ RACE☐ COLOR☒ SEX☐ RELIGION☐ NATIONAL ORIGIN☒ RETALIATION☐ AGE☐ DISABILITY☐ OTHER (Specify)

DATE DISCRIMINATION TOOK PLACE

EARLIEST

LATEST

05/10/2001

☐ CONTINUING ACTION

THE PARTICULARS ARE (If additional space is needed, attach extra sheet(s)):

I have been employed at Respondent as a security guard since October 2000. Since approximately February 2001 I have been continually subjected to sexual harassment by the owner in that he has repeatedly made unwelcome sexual advances and requests that I have sex with him. At his first sexual advance in February and thereafter I made known to him that his advances were unwelcome. I was retaliated against for refusing his advances in that on or about April 20, 2000 I was compelled to come to work even though I was sick, and on May 22, 2001 I was suspended for 2 days for calling in sick one one day due to my child's illness.

I believe I have been discriminated against because of my sex, female, and retaliated against, in violation of Title VII of the Civil Rights Act of 1964, as amended.

I want this charge filed with both the EEOC and the State or local Agency, if any. I will advise the agencies if I change my address or telephone number and cooperate fully with them in the processing of my charge in accordance with their procedures.

I declare under penalty of perjury that the foregoing is true and correct.

NOTARY - (When necessary for State and Local Requirements)

I swear or affirm that I have read the above charge and that it is true to the best of my knowledge, information and belief.

SIGNATURE OF COMPLAINANT

SUBSCRIBED AND SWORN TO BEFORE ME THIS DATE
(Month, day and year)

Date

Charging Party (Signature)

EXHIBIT B

CHARGE OF DISCRIMINATION

AGENCY

CHARGE NUMBER

☐ FEPA
☒ EEOC

210A14894

This form is affected by the Privacy Act of 1974; See Privacy Act Statement before completing this form.

Illinois Dept. of Human Rights

State or local Agency, if any

and EEOC

NAME (Indicate Mr., Ms., Mrs.)

HOME TELEPHONE (Include Area Code)

Ms. Asmar Dankha

(773) 457-8844

STREET ADDRESS

CITY, STATE AND ZIP CODE

DATE OF BIRTH

5526 North Campbell, Chicago, IL 60625

NAMED IS THE EMPLOYER, LABOR ORGANIZATION, EMPLOYMENT AGENCY APPRENTICESHIP COMMITTEE, STATE OR LOCAL GOVERNMENT AGENCY WHO DISCRIMINATED AGAINST ME (If more than one list below.)

NAME

NUMBER OF EMPLOYEES, MEMBERS

TELEPHONE (Include Area Code)

Secure Security

Cat A (15-100)

(773) 769-1625

STREET ADDRESS

CITY, STATE AND ZIP CODE

COUNTY

5681 North Lincoln Avenue, Chicago, IL 60659

031

NAME

TELEPHONE NUMBER (Include Area Code)

STREET ADDRESS

CITY, STATE AND ZIP CODE

COUNTY

CAUSE OF DISCRIMINATION BASED ON (Check appropriate box(es))

DATE DISCRIMINATION TOOK PLACE
EARLIEST LATEST☐ RACE ☐ COLOR ☐ SEX ☐ RELIGION ☐ NATIONAL ORIGIN
☒ RETALIATION ☐ AGE ☐ DISABILITY ☐ OTHER (Specify)

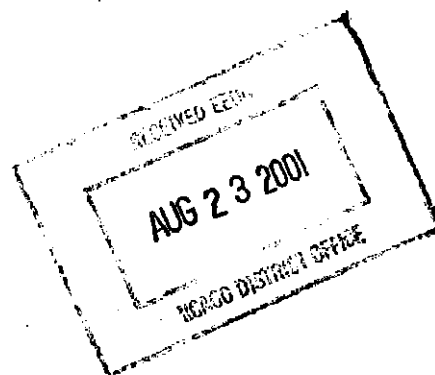
05/30/2001 06/08/2001

☐ CONTINUING ACTION

THE PARTICULARS ARE (If additional space is needed, attach extra sheet(s)):

I filed EEOC Charge No. 210A13374 against Respondent on May 23, 2001. On May 30, 2001, I was notified by Respondent that, after working approximately seven months at my most recent job assignment, I was being reassigned to a location farther from my home with a work schedule that I was unable to work. Subsequently, I had no choice but to submit my resignation on June 8, 2001.

I believe I have been retaliated against by Respondent, in violation of Title VII of the Civil Rights Act of 1964, as amended.



I want this charge filed with both the EEOC and the State or local Agency, if any. I will advise the agencies if I change my address or telephone number and cooperate fully with them in the processing of my charge in accordance with their procedures.

NOTARY - (When necessary for State and Local Requirements)

I swear or affirm that I have read the above charge and that it is true to the best of my knowledge, information and belief.

I declare under penalty of perjury that the foregoing is true and correct.

SIGNATURE OF COMPLAINANT

SUBSCRIBED AND SWORN TO BEFORE ME THIS DATE
(Month, day and year)Date 8/20/2001
EEOC FORM 5 (Rev. 07/99)

Charging Party (Signature)

ASMAR DANKHA

CHARGING PARTY COPY

EXHIBIT C



U.S. EQUAL EMPLOYMENT OPPORTUNITY COMMISSION
Chicago District Office

500 West Madison St., Suite 2800
Chicago, IL 60661
PH: (312) 353-2713
TDD: (312) 353-2421
ENFORCEMENT FAX: (312) 886-1168
LEGAL FAX: (312) 353-8555

EEOC Charge Number 210A14894

Asmar Dankha
5526 North Campbell
Chicago, Illinois 60625

Charging Party

v.

Secure Security
5681 North Lincoln Avenue
Chicago, Illinois 60659

Respondent

DETERMINATION

Under the authority vested in me by the Commission's Procedural Regulations, I issue the following determination on the merits of the subject charge filed under Title VII of the Civil Rights Act of 1964, as amended (Title VII).

Respondent is an employer within the meaning of Title VII and all requirements for coverage have been met.

Charging Party alleges that she was retaliated against in that after she filed a charge of discrimination alleging sexual harassment, she was reassigned and forced to resign, in violation of Title VII.

I have determined that the evidence obtained in the investigation establishes reasonable cause to believe that Respondent retaliated against Charging Party, in that Charging Party was reassigned and constructively discharged after filing a Charge of Discrimination, in violation of Title VII.

This determination is final. When the Commission finds that violations have occurred, it attempts to eliminate unlawful practices by informal methods of conciliation. Therefore, I invite the parties to join with the Commission in reaching a just resolution of this matter. Disclosure of information obtained by the Commission during the conciliation process will be made only in accordance with the Commission's Procedural Regulations (29 CFR Part 1601.26).

If the Respondent wishes to accept this invitation to participate in conciliation efforts, it may do so at this time by proposing terms for a conciliation agreement; that proposal should be provided to the Commission representative within 14 days of the date of this determination. The remedies for violations of the statutes we enforce are designed to make the identified victims whole and to provide corrective and preventive relief. These remedies may include, as appropriate, an agreement by the Respondent to not engage in unlawful employment practices, placement of identified victims

Determination
EEOC Charge No. 210A14894
Page 2 of 2

in positions they would have held but for discriminatory actions, back pay, restoration of lost benefits, injunctive relief, compensatory and/or punitive damages, and notice to employees of the violation and the resolution of the claim.

Should the Respondent have further questions regarding the conciliation process or the conciliation terms it would like to propose, we encourage it to contact the assigned Commission representative. Should there be no response from the Respondent in 14 days, we may conclude that further conciliation efforts would be futile or nonproductive.

On Behalf of the Commission,

April 26, 2002
Date

John P. Rowe *rw*
John P. Rowe
District Director

EXHIBIT D



U.S. EQUAL EMPLOYMENT OPPORTUNITY COMMISSION
Chicago District Office

500 West Madison St., Suite 2800
Chicago, IL 60661
PH: (312) 353-2713
TDD: (312) 353-2421
ENFORCEMENT FAX: (312) 886-1168
LEGAL FAX: (312) 353-8555

July 16, 2002

Asmar Dankha
5526 N. Campbell
Chicago, IL 60625

RE: Charging Party: A. Dankha
Respondent: Secure Security
EEOC Number: 210A13374 & 210A14894

Dear Ms. Dankha:

The enclosed Notice of Right to Sue was sent to you on 05/28/02 . However, the Postal Service returned it to the Commission because it was unclaimed..

We are sending it via regular mail so that you may have another opportunity to receive it.

Sincerely,


John P. Rowe
District Director

Enclosure

EQUAL EMPLOYMENT OPPORTUNITY COMMISSION

NOTICE OF RIGHT TO SUE -- TITLE VII / ADA/ADEA

(Conciliation Failure)

To: Asmar Dunkha
5526 North Campbell
Chicago, IL 60625

From: Chicago District Office
Equal Employment Opportunity Commission
500 West Madison Street, Suite 2800
Chicago, Illinois 60661-2511

CERT. MAIL #: 7099 3400 0006 7146 8536 C/P



On behalf of a person aggrieved whose identity is CONFIDENTIAL

(29 C.F.R. 1601.7(a))

Charge Number

EEOC Representative

Telephone Number

210A13374

Regina Husar, Enforcement Supervisor

(312) 353-0819

(See the additional information attached to this form.)

The Commission has found reasonable cause to believe that your charge of employment discrimination is true but has not entered into a conciliation agreement to which you are a party because attempts to achieve such a voluntary settlement with respondent(s) have been unsuccessful.

The Commission has determined that it will not bring a civil action against the respondent(s) and accordingly is issuing this Notice of Right to Sue. With the issuance of this Notice the Commission terminates its process with respect to your charge, except that the Commission may seek status as intervenor if you decide to sue on your own behalf as described below.

If you want to pursue your charge further, you have the right to sue the respondent(s) named in your charge in a court of competent jurisdiction. IF YOU DECIDE TO SUE, YOU MUST DO SO WITHIN NINETY (90) DAYS FROM YOUR RECEIPT OF THIS NOTICE OF RIGHT TO SUE; OTHERWISE YOUR RIGHT TO SUE IS LOST.

Your suit may include any allegation contained in your charge of employment discrimination or any matter which was or should have been discovered by the Commission during its investigation of your charge.

On Behalf of the Commission

May 28, 2002John P. Rowe *ch*

John P. Rowe, District Director

Enclosures

Information sheet

cc: Respondent(s)

Secure Security

EEOC Form 161-A (Rev. 10/94)

Result

Type

Pages

Duration

Identification

Time

Last Fax

Officer R. Berles
Professional Printer/Fax/Copier/Scanner

CIVIL COVER SHEET

The JS-44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. (SEE INSTRUCTIONS ON THE REVERSE OF THE FORM.)

(a) PLAINTIFFS

DANKHA, ASMAR

JUDGE PALLMEYER

DEFENDANTS

SECURE SECURITY, INC.

(b) County of Residence of First Listed Plaintiff Cook
(EXCEPT IN U.S. PLAINTIFF CASES)County of Residence of First Listed Cook
(IN U.S. PLAINTIFF CASES ONLY)

NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF THE LAND INVOLVED.

MAGISTRATE JUDGE MASON

(c) Attorney's (Firm Name, Address, and Telephone Number)

Bae & Bae, P.C. (612) 364-0443
39 S. LaSalle St. #311, Chicago 60603

Attorneys (If Known)

02C 7371

II. BASIS OF JURISDICTION (Place an "X" in One Box Only)

- ☐ 1 U.S. Government Plaintiff
- ☒ 3 Federal Question (U.S. Government Not a Party)
- ☐ 2 U.S. Government Defendant
- ☐ 4 Diversity (Indicate Citizenship of Parties in Item III)

III. CITIZENSHIP OF PRINCIPAL PARTIES (Place an "X" in One Box for Plaintiff and One Box for Defendant)

- Citizen of This State ☐ 1 ☐ 1 Incorporated or Principal Place of Business In This State ☐ 4 ☐ 4
- Citizen of Another State ☐ 2 ☐ 2 Incorporated and Principal Place of Business In Another State ☐ 5 ☐ 5
- Citizen or Subject of a Foreign Country ☐ 3 ☐ 3 Foreign Nation ☐ 6 ☐ 6

IV. NATURE OF SUIT (Place an "X" in One Box Only)

CONTRACT	TORTS	FORFEITURE/PENALTY	BANKRUPTCY	OTHER STATUTES
<input type="checkbox"/> 110 Insurance <input type="checkbox"/> 120 Marine <input type="checkbox"/> 130 Miller Act <input type="checkbox"/> 140 Negotiable Instrument <input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment <input type="checkbox"/> 151 Medicare Act <input type="checkbox"/> 152 Recovery of Defaulted Student Loans (Excl. Veterans) <input type="checkbox"/> 153 Recovery of Overpayment of Veteran's Benefits <input type="checkbox"/> 160 Stockholders' Suits <input type="checkbox"/> 190 Other Contract <input type="checkbox"/> 195 Contract Product Liability	PERSONAL INJURY <input type="checkbox"/> 310 Airplane <input type="checkbox"/> 315 Airplane Product Liability <input type="checkbox"/> 320 Assault, Libel & Slander <input type="checkbox"/> 330 Federal Employers' Liability <input type="checkbox"/> 340 Marine <input type="checkbox"/> 345 Marine Product Liability <input type="checkbox"/> 350 Motor Vehicle <input type="checkbox"/> 355 Motor Vehicle Product Liability <input type="checkbox"/> 360 Other Personal Inj.	PERSONAL INJURY <input type="checkbox"/> 362 Personal Injury—Med. Malpractice <input type="checkbox"/> 365 Personal Injury—Product Liability <input type="checkbox"/> 368 Asbestos Personal Injury Product Liability PERSONAL PROPERTY <input type="checkbox"/> 370 Other Fraud <input type="checkbox"/> 371 Truth in Lending <input type="checkbox"/> 380 Other Personal Property Damage <input type="checkbox"/> 385 Property Damage Product Liability	<input type="checkbox"/> 422 Appeal 28 USC 158 <input type="checkbox"/> 423 Withdrawal 28 USC 157 PROPERTY RIGHTS <input type="checkbox"/> 820 Copyrights <input type="checkbox"/> 830 Patent <input type="checkbox"/> 840 Trademark	<input type="checkbox"/> 400 State Reapportionment <input type="checkbox"/> 410 Antitrust <input type="checkbox"/> 430 Banks and Banking <input type="checkbox"/> 450 Commerce/ICC Rates/etc. <input type="checkbox"/> 460 Deportation <input type="checkbox"/> 470 Racketeer Influenced and Corrupt Organizations <input type="checkbox"/> 810 Selective Service <input type="checkbox"/> 850 Securities/Commodities/Exchange <input type="checkbox"/> 875 Customer Challenge 12 USC 3410 <input type="checkbox"/> 891 Agricultural Acts <input type="checkbox"/> 892 Economic Stabilization Act <input type="checkbox"/> 893 Environmental Matters <input type="checkbox"/> 894 Energy Allocation Act <input type="checkbox"/> 895 Freedom of Information Act <input type="checkbox"/> 900 Appeal of Fee Determination Under Equal Access to Justice <input type="checkbox"/> 950 Constitutionality of State Statutes <input type="checkbox"/> 890 Other Statutory Actions
REAL PROPERTY <input type="checkbox"/> 210 Land Condemnation <input type="checkbox"/> 220 Foreclosure <input type="checkbox"/> 230 Rent Lease & Ejectment <input type="checkbox"/> 240 Torts to Land <input type="checkbox"/> 245 Tort Product Liability <input type="checkbox"/> 290 All Other Real Property	CIVIL RIGHTS <input type="checkbox"/> 441 Voting <input checked="" type="checkbox"/> 442 Employment <input type="checkbox"/> 443 Housing/Accommodations <input type="checkbox"/> 444 Welfare <input type="checkbox"/> 440 Other Civil Rights	PRISONER PETITIONS <input type="checkbox"/> 510 Motions to Vacate Sentence <input type="checkbox"/> Habeas Corpus: <input type="checkbox"/> 530 General <input type="checkbox"/> 535 Death Penalty <input type="checkbox"/> 540 Mandamus & Other <input type="checkbox"/> 550 Civil Rights <input type="checkbox"/> 555 Prison Condition	LABOR <input type="checkbox"/> 710 Fair Labor Standards Act <input type="checkbox"/> 720 Labor/Mgmt. Relations <input type="checkbox"/> 730 Labor/Mgmt. Reporting & Disclosure Act <input type="checkbox"/> 740 Railway Labor Act <input type="checkbox"/> 790 Other Labor Litigation <input type="checkbox"/> 791 Empl. Ret. Inc. Security Act	SOCIAL SECURITY <input type="checkbox"/> 861 HIA (1395ff) <input type="checkbox"/> 862 Black Lung (923) <input type="checkbox"/> 863 DIWC/DIWW (405(g)) <input type="checkbox"/> 864 SSID Title XVI <input type="checkbox"/> 865 RSI (405(g)) FEDERAL TAX SUITS <input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant) <input type="checkbox"/> 871 IRS—Third Party 26 USC 7609

V. ORIGIN (PLACE AN "X" IN ONE BOX ONLY)

- ☒ 1 Original Proceeding ☐ 2 Removed from State Court ☐ 3 Remanded from Appellate Court ☐ 4 Reinstated or Reopened ☐ 5 Transferred from another district (specify) ☐ 6 Multidistrict Litigation ☐ 7 Appeal to District Judge from Magistrate Judgment

VI. CAUSE OF ACTION (Cite the U.S. Civil Statute under which you are filing and write brief statement of cause.)

Do not cite jurisdictional statutes unless diversity.)

Title VII of the Civil Rights Act of 1964, as amended, USC § 2000(e). Plaintiff brings this action for claims of sexual harassment and retaliation in violation of Title VII.

VII. REQUESTED IN COMPLAINT: ☐ CHECK IF THIS IS A CLASS ACTION UNDER F.R.C.P. 23

DEMAND \$

CHECK YES only if demanded in complaint:

JURY DEMAND: ☒ Yes ☐ NoVIII. This case ☒ is not a refiling of a previously dismissed action.☐ is a refiling of case _____, previously dismissed by Judge _____

DATE 10/15/02 SIGNATURE OF ATTORNEY OF RECORD

DOCKETED

OCT 16 2002

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS

JUDGE PALLMEYER

In the Matter of

DANKHA, ASMAR

v.

SECURIS SECURITY, INC.

APPEARANCES ARE HEREBY FILED BY THE UNDERSIGNED AS ATTORNEY(S) FOR:

ASMAR DANKHA

0207371
MAGISTRATE JUDGE MASON
Case Number

02 OCT 15 PM 3:00

CLERK
U.S. DISTRICT COURT

(A)		(B)	
SIGNATURE <i>[Signature]</i>		SIGNATURE <i>[Signature]</i>	
NAME SAMUEL S. BAE		NAME JENNIFER E. BAE	
FIRM BAE & BAE P.C.		FIRM BAE & BAE P.C.	
STREET ADDRESS 39 S. LaSalle St. Suite 311		STREET ADDRESS 39 S. LaSalle St. Suite 311	
CITY/STATE/ZIP Chicago, IL 60603		CITY/STATE/ZIP Chicago, IL 60603	
TELEPHONE NUMBER 312/364-0443	FAX NUMBER 312/364-0449	TELEPHONE NUMBER 312/364-0443	FAX NUMBER 312/364-0449
E-MAIL ADDRESS		E-MAIL ADDRESS	
IDENTIFICATION NUMBER (SEE ITEM 4 ON REVERSE) 6257863		IDENTIFICATION NUMBER (SEE ITEM 4 ON REVERSE) 6239405	
MEMBER OF TRIAL BAR? YES <input type="checkbox"/> NO <input checked="" type="checkbox"/>		MEMBER OF TRIAL BAR? YES <input checked="" type="checkbox"/> NO <input type="checkbox"/>	
TRIAL ATTORNEY? YES <input checked="" type="checkbox"/> NO <input type="checkbox"/>		TRIAL ATTORNEY? YES <input checked="" type="checkbox"/> NO <input type="checkbox"/>	
		DESIGNATED AS LOCAL COUNSEL? YES <input type="checkbox"/> NO <input type="checkbox"/>	
(C)		(D)	
SIGNATURE		SIGNATURE	
NAME		NAME	
FIRM		FIRM	
STREET ADDRESS		STREET ADDRESS	
CITY/STATE/ZIP		CITY/STATE/ZIP	
TELEPHONE NUMBER	FAX NUMBER	TELEPHONE NUMBER	FAX NUMBER
E-MAIL ADDRESS		E-MAIL ADDRESS	
IDENTIFICATION NUMBER (SEE ITEM 4 ON REVERSE)		IDENTIFICATION NUMBER (SEE ITEM 4 ON REVERSE)	
MEMBER OF TRIAL BAR? YES <input type="checkbox"/> NO <input type="checkbox"/>		MEMBER OF TRIAL BAR? YES <input type="checkbox"/> NO <input type="checkbox"/>	
TRIAL ATTORNEY? YES <input type="checkbox"/> NO <input type="checkbox"/>		TRIAL ATTORNEY? YES <input type="checkbox"/> NO <input type="checkbox"/>	
DESIGNATED AS LOCAL COUNSEL? YES <input type="checkbox"/> NO <input type="checkbox"/>		DESIGNATED AS LOCAL COUNSEL? YES <input type="checkbox"/> NO <input type="checkbox"/>	